United States District Court

SOUTHERN DISTRICT OF NEW YORK

Halpert Enterprises

Plaintiff,

cv 5454

- against -

MOTION TO ADMIT COUNSEL

ABN Amro Holdings,

N.V., et al.

Defendant.

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, Harry Wise

a member in good standing of

2001 OCT 10 PH 1:55

the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Marc. M. Umeda

Firm Name:

Robbins Umeda & Fink, LLP

Address:

610 West Ash Street, Suite 1800

City/State/Zip:

San Diego, CA 92101

Phone Number:

(619) 525-3990

Fax Number:

(619) 525-3991

Marc. M. Umeda

is a member in good standing of the Bar of the States of

California

There are no pending disciplinary proceeding against Marc. M. Umeda in any State or Federal court.

Dated: Sept 13, 2007

City, State: NEW YORK NY

Respectfully submitted,

Sponsor's HARRY H. WISE, I

SDNY Bar (HUS 6841)

Firm Name: Law Office of Thomas G. Amon

Address: 500 F, Fth Avenue City/State/Zip: New Tork, N.Y 10110

Phone Number: (212) 810-2430

Fax Number:

R10-2427 (212)

SDNY Form Web 10/2006

UNITED STATES DISTRICT COURT SOUTHERN DISTRIC OF NEW YORK

HALPERT ENTERPRISES, On Behalf of Itself and All Others Similarly Situated,

Plaintiff,

v.

ABN AMRO HOLDING N.V., RIJKMAN GROENINK, WILCO JISKOOT, JOOST KUIPER, HUGH SCOTT-BARRETT, HUIBERT BOUMEESTER, PIERO OVERMARS, RON TEERLINK, ARTUR MARTINEZ, ANDRE OLIJSLAGER, LOUISE GROENMAN, DAVID BARON DE ROTHSCHILD, TRUDE MAAS-DE BROUWER, MARCUS PRATINI DE MORAES, PAOLO SCARONI, LORD SHARMAN OF REDLYNCH, ROB VAN DEN BERGH, ANTHONY RUYS, GERTJAN KRAMER, GERHARD RANDA AND BANK OF AMERICA CORP.,

Defendants.

Civ. Action No. 07-CV-5454

AFFIDAVIT OF HARRY WISE IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

State of New York) ss: County of New York)

Harry H. Wise, III being duly sworn, hereby deposes and says as follows:

- I am counsel to the Law Offices of Thomas G. Amon, and counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Marc M. Umeda as counsel pro hac vice to represent Plaintiff in this matter.
- I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1976. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have know Marc M. Umeda for several months.
- 4. Mr. Umeda is a partner with the law firm of Robbins Umeda & Fink, LLP

- I have found Mr. Umeda to be a skilled attorney who is experienced n Federal practice and is 5. familiar with the Federal Rules of Procedure, and of high moral character
- Accordingly, I am pleased to move the admission of Marc M. Umeda, pro hac vice. 6.
- 7. I respectfully submit a proposed order granting the admission of Marc M. Umeda, pro hac vice, which is attached hereto as Exhibit A. HIS wood STADING CERTIFICATE IS GAMERED hereto DS EXHIBIT B. WHEREFORE it is respectfully requested that the motion to admit Marc M. Umeda, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

(HW6841)

Sworn to before me This day of September, 2007

Thomas G. Amon Notary Public, State of New York No. 02AM6059182

Qualified In New York County

Commission Expires May 21, 2093

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(KPK)

Southern District of New York				
Halpert Enterprises	Plaintiff,			
		07	ev 5454	

- against -

ABN Amro Holdings, N.V., et al.

Defendant.

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Harry Wise attorney for Halpert Enterprises and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:

Marc. M. Umeda

Firm Name:

Robbins Umeda & Fink, LLP

Address:

610 West Ash Street, Suite 1800

City/State/Zip:

San Diego, CA 92101

Telephone/Fax:

(619) 525-3990

Email Address:

(619) 525-3991

is admitted to practice pro hac vice as counsel for Halpert Enterprises in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: City, State:

United States District/Magistrate Judge

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

September 20, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MARC MASATARO UMEDA, #197847, was admitted to the practice of law in this state by the Supreme Court of California on December 2, 1998; that from the date of admission to February 23, 2000, he was an ACTIVE member of the State Bar of California; that on February 23, 2000, he transferred at his request to the INACTIVE status as of May 4, 1999; that from that date to June 19, 2001, he was an INACTIVE member of the State Bar of California; that on June 19, 2001, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

heed fact

Custodian of Membership Records

DECLARATION OF SERVICE

I, Harry H. Wise, III, counsel for plaintiff in this action, hereby declare that on the 10th day of October, 2007, I served the annexed Motion for Admission Pro Hac Vice upon Lawrence J. Portnoy, Esq., Davis Polk & Wardwell, counsel for defendants, at 450 Lexington Avenue, New York, N.Y. 10017, by mailing him a copy by First Class Mail.

Dated: October 10, 2007 New York, N.Y.

DOV